TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

DAEC Proposal to Consolidate Identical SRs after SFCP Adoption

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

	SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	~~24 hours~~
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	~~31 days~~
~~SR 3.3.5.1.3~~	~~Perform CHANNEL FUNCTIONAL TEST.~~	~~92 days~~
SR 3.3.5.1.4 [3]	Perform CHANNEL CALIBRATION.	~~92 days~~
~~SR 3.3.5.1.5~~	~~Perform CHANNEL FUNCTIONAL TEST.~~	~~12 months~~
~~SR 3.3.5.1.6~~	~~Perform CHANNEL CALIBRATION.~~	~~12 months~~
~~SR 3.3.5.1.7~~	~~Perform CHANNEL CALIBRATION.~~	~~18 months~~
~~SR 3.3.5.1.8~~	~~Perform CHANNEL CALIBRATION.~~	~~24 months~~
SR 3.3.5.1.9 [4]	Perform LOGIC SYSTEM FUNCTIONAL TEST.	~~24 months~~

In accordance with the Surveillance Frequency Control Program

In accordance with the Surveillance Frequency Control Program

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

ECCS Instrumentation
3.3.5.1

Table 3.3.5.1-1 (page 1 of 5)
Emergency Core Cooling System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Vessel Water Level – Low Low Low	1,2,3, 4(a), 5(a)	4(b)	B	SR 3.3.5.1.1 2 SR 3.3.5.1.2 3 SR 3.3.5.1.4 4 SR 3.3.5.1.5	≥ 38.3 inches
b. Drywell Pressure – High	1,2,3	4(b)	B	SR 3.3.5.1.3 2 SR 3.3.5.1.6 3 SR 3.3.5.1.7 4	≤ 2.19 psig
c. Reactor Steam Dome Pressure – Low (Injection Permissive)	1,2,3	4	C	SR 3.3.5.1.2 2 SR 3.3.5.1.4 5 SR 3.3.5.1.5 6	≥ 363.3 psig and ≤ 485.1 psig
	4(a), 5(a)	4	B	SR 3.3.5.1.5 2 SR 3.3.5.1.7 3 SR 3.3.5.1.8 4	≥ 363.3 psig and ≤ 485.1 psig
d. Core Spray Pump Discharge Flow – Low (Bypass)	1,2,3, 4(a), 5(a)	1 per pump	E	SR 3.3.5.1.3 2 SR 3.3.5.1.6 3 SR 3.3.5.1.7 4	≥ 256.6 gpm and ≤ 2382.1 gpm
e. Core Spray Pump Start Time Delay Relay	1,2,3, 4(a), 5(a)	1 per pump	C	SR 3.3.5.1.8 3 SR 3.3.5.1.9 4	≥ 2.6 seconds and ≤ 6.8 seconds
f. 4.16 kV Emergency Bus Sequential Loading Relay	1,2,3, 4(a), 5(a)	1 per pump	F	SR 3.3.5.1.5 2 SR 3.3.5.1.6 3 SR 3.3.5.1.8 4	≤ 3600 V
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Vessel Water Level– Low Low Low	1,2,3, 4(a), 5(a)	4	B	SR 3.3.5.1.1 2 SR 3.3.5.1.2 3 SR 3.3.5.1.4 4 SR 3.3.5.1.5	≥ 38.3 inches
b. Drywell Pressure – High	1,2,3	4	B	SR 3.3.5.1.2 2 SR 3.3.5.1.6 3 SR 3.3.5.1.7 4	≤ 2.19 psig

(continued)

(a) When associated ECCS subsystem(s) are required to be OPERABLE per LCO 3.5.2, ECCS–Shutdown.

(b) Also required to initiate the associated Diesel Generator (DG).

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

ECCS Instrumentation
3.3.5.1

	SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.3	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.4	Perform LOGIC SYSTEM FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

ECCS Instrumentation
3.3.5.1

	SURVEILLANCE	FREQUENCY
SR 3.3.5.1.1	Perform CHANNEL CHECK.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.3	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.4	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.5	Perform CHANNEL FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.6	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.7	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.8	Perform CHANNEL CALIBRATION.	In accordance with the Surveillance Frequency Control Program
SR 3.3.5.1.9	Perform LOGIC SYSTEM FUNCTIONAL TEST.	In accordance with the Surveillance Frequency Control Program

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

ECCS Instrumentation
B 3.3.5.1

BASES

SURVEILLANCE REQUIREMENTS

SR 3.3.5.1.4, SR 3.3.5.1.6, SR 3.3.5.1.7, and SR 3.3.5.1.8

A CHANNEL CALIBRATION is a complete check of the instrument loop and the sensor. This test verifies the channel responds to the measured parameter within the necessary range and accuracy. CHANNEL CALIBRATION leaves the channel adjusted to account for instrument drifts between successive calibrations consistent with the plant specific setpoint methodology.

The Frequency of SR 3.3.5.1.4 is based upon the assumption of a 92 day calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.6 is based upon the assumption of a 12 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.7 is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

The Frequency of SR 3.3.5.1.8 is based upon the assumption of a 24 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis.

TSTF

Technical Specifications Task Force
A Joint Owners Group Activity

Examples of Recent Issues with TSTF-425 Adoption Submittals

- Staff Challenged the DAEC Categorization as an Administrative Change from TSTF-425
- Staff Viewed the Proposal not as a "Consolidation" but "Removal" of SRs (a Technical Change)
- Staff Cited §50.36(c)(3) as the Basis for Their Concern with the "Removal"
- DAEC Agree to Withdraw the Consolidation to Allow Continued Review of the LAR.

NRC FORM 8C
(7-94)
NRCMD 3.57

COVER SHEET FOR CORRESPONDENCE

USE THIS COVER SHEET TO PROTECT ORIGINALS OF MULTI-PAGE CORRESPONDENCE